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ORIGINAL

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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUN 29 2006

at 2 o'clock and 00 min
SUE BEITIA, CLERK

Attorney for Defendant
Art Ramirez

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 04-00438 HG
)	
Plaintiff,)	NOTICE OF MOTION; MOTION
)	FOR EARLY TERMINATION OF
vs.)	PROBATION; DECLARATION
)	OF COUNSEL; EXHIBIT "A";
ART RAMIREZ,)	CERTIFICATE OF SERVICE
)	
Defendant.)	Date:
)	Time:
_____)	Judge: Helen Gillmor


NOTICE OF MOTION

TO: Chris A. Thomas
Assistant United States Attorney
300 Ala Moana Boulevard, Suite 6100
Honolulu, Hawaii 96813
Attorney for Plaintiff United States of America

Brandon Schneider
United States Probation Officer
5500 Telegraph Road, Suite 241
Ventura, California 93003

PLEASE TAKE NOTICE that the following motion will be heard before
the Honorable _____, in his/her
courtroom in the United States Courthouse, 300 Ala Moana Boulevard, Honolulu,
Hawaii, on _____, 2006 at _____ m., or as soon as counsel
may be heard.

DATED: Honolulu, Hawaii, June 28, 2006.


BIRNEY B. BERVAR
Attorney for Defendant
Art Ramirez

UNITED STATES OF AMERICA v. ART RAMIREZ; CR. NO. 04-00438 HG; In the
United States District Court for the District of Hawaii; Notice of Motion; Motion for
Early Termination of Probation; Declaration of Counsel; Exhibit "A"; Certificate of
Service.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

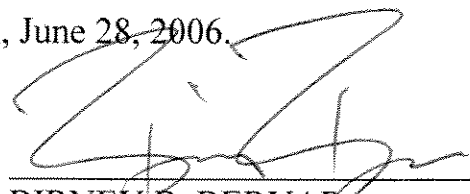
UNITED STATES OF AMERICA,)	CR. NO. 04-00438 HG
)	
Plaintiff,)	MOTION FOR EARLY
)	TERMINATION OF
vs.)	PROBATION
)	
ART RAMIREZ,)	
)	
Defendant.)	
_____)	

MOTION FOR EARLY TERMINATION OF PROBATION

Comes Now, Defendant Art Ramirez, through counsel, Birney B. Bervar, and moves this court for early termination for his three (3) year term of probation imposed by this court on May 19, 2005. Ramirez has complied with all the terms and conditions of his probation. Ramirez is employed full-time and lives with his wife and four children in Ventura, California, and therefore further requests that his presence at the hearing on this motion be waived, or that he be allowed to appear by telephone.

This motion is based upon the attached Declaration of Counsel, the records and files herein, and such further evidence as the court may hear.

DATED: Honolulu, Hawaii, June 28, 2006.



BIRNEY B. BERVAR
Attorney for Defendant
Art Ramirez